

BRAC Cleanup Team HPNS Meeting Agenda

May 6, 2021

Microsoft Teams Call

Call-in 1-469-214-8538

Passcode: 4211-49258

9:00am – 11:00

Agenda

1. Introductions (Derek Robinson)

- Navy Derek, Brooks, Paul, Leslie, Liz, Dennis, Leo, Heather
- EPA John, Wayne, Yolanda, Karen,
- DTSC/CDPH – Nina/Vixel (for Terry)
- Waterboard – Jeff, David, Phyllis
- SFDPH – Amy and Christina R.

2. Navy Business/Action Items (Derek Robinson)

Notes

3. Document tracking (Navy)

Parcel F Tech Memo and ROD - We do have obligations to other parties (responsible parties) and the community.

- John wanted to clarify the Navy's tech memo on Parcel F will be informed by the Yosemite Slough tech memo which was recently finalized. EPA and the state agencies are in agreement on the change for the PCB cleanup levels. EPA is providing an opportunity to comment on the tech memo. EPA still needs to negotiate another AOC and there is some hesitation until the Navy's cleanup values are determined in a decision document. The only thing that is left to do is publish the action memo, which will be complete soon after the Navy's tech memo (this is EPA's commitment).
- Navy suggests they need the action memo to finalize the ROD.

- The final ROD had been scheduled for November 2021, but it's on the DTM with a new date into 2022. Judy doesn't recall an extension request. This new timing is concerning.
- Yolanda brought up concerns about the Navy quietly extending the final Parcel F ROD. John suggested a separate meeting on this topic with site attorneys and first-line supervisors, if the Navy moves forward with pushing out the ROD from November. David wants to ensure the Waterboard is included. The Navy will respond to Judy on the extension request.

Wayne asked if the Parcel E draft workplan address comments EPA has made on the previous workplans (Parcel B comments)? Sean-Ryan said that Parcel E should reflect the agencies comments thus far.

4. Fieldwork Updates (Navy)

White space scanning – Paul mentioned the contractors will follow-up on any elevated measurements. Paul mentioned they were 98% complete (basewide). Amy asked if they have finished UC2, and Leo said they were complete on the initial survey. There is some vegetation removal work to finish some things up.

Photos of the sheet pile on Parcel E and moving rocks around.

Nina asked for an update on the status of the asbestos on Parcel E. Brooks said the Navy is still working on the contracting issues related to addressing the asbestos and continue to do air monitoring. Nina asked if the Navy planned to develop a work plan and if the BCT would be provided with the workplan. The Navy suggested a sidebar on this topic. **Action Item** Yolanda requested EPA be included in that discussion.

5. Navy Environmental Program

Derek wanted to clarify the mission of the Navy's program for all the new people

Paul wanted to make a distinction between performance vs basewide groundwater monitoring program but failed to provide an explanation. Derek mentioned it does "bound back and forth" between all of these projects. Different contractors are doing the work among many years and the data goes into the basewide groundwater monitoring program. He said the groundwater monitoring program is not designed to evaluate that data until there is no further groundwater remedial action. Karen mentioned its challenging to have different contractors doing this type of monitoring. From EPA's perspective, the Navy is still under performance management. Derek agreed it is confusing and disjointed, but it didn't know of a

better approach. He is open to suggestions on how to do this better. Karen thought this discussion would be better as a smaller call. She heard that the data for treatment has to go into the basewide groundwater monitoring program; however, performance monitoring has not been completed. The data doesn't support the remedial action work is complete. Karen suggested a grand matrix tracking all of this. Brooks brought up an idea of a flowchart or operating chart to present how the groundwater monitoring plan works. She suggests the week of May 24th for a meeting.

- Phyllis asked why the performance monitoring period be contracted through 7 sampling events instead of 3. Karen suggests 7 sampling events is typical to enable statistical analysis. Nina mentioned the number of sampling events has been dependent on the workplan/sampling activity. Derek mentioned contracts out 3+ years is challenging. Karen clarified the 7 sampling events is expected in a 24 month period. EPA understands the contracting challenges and there needs to be more discussion on how to incorporate the data in a way that provides information (supporting analysis).
- Nina asked for the Navy to reexamine the groundwater monitoring plan and performance monitoring plan for Parcel C. She suggests no firm decisions have been made at Parcel C and suggested the performance monitoring at Parcel C was expected to be ongoing. Brooks mentioned Parcel C moves "in and out."

RACSR discussions: Derek started a discussion about documents have changed names over time. The agencies have suggested comments on a previous document need to "go away" and be included in the future. There is an issue with Navy policy on removing comments, as they are part of the administrative record. Heather suggested any comments in RTCs are part of the administrative record, tied to the original document (regardless of name change). This is extremely important as the draft and draft final documents do not get carried through to final. Karen agreed that made sense.

For Parcel E-2 RACSR letter from the agencies: EPA/Waterboard was clear it wasn't supposed to be a name change, but a substantive change to the RACR. That was not what the Navy did. The agencies haven't received a RACR. EPA wants to be clear that we start at "ground zero" with a future RACR. Derek suggested it was never the Navy's intent for the RACSR to be a RACR. It is important to have a summary of what the contractor did. He suggested the Navy removed a lot of language from this document that gave the impression the Navy was complete with the remedial action. When the Navy received the letter from EPA/Waterboard, the

Navy was confused. First, there is confusion on how this letter is received by the public that the regulatory agencies “reject” the document. The Navy believes it removed the interpretation of the data and is confused by it was rejected. Karen clarified that EPA rejected the RTCs as they were related to the predecessor document, the predecessor document, and the idea that construction is complete. The upland slurry wall was not completed as designed. EPA appreciates that there will be a follow-on workplan on Parcel E-2. Derek said they made the changes we agreed to, plus an additional follow-up workplan. EPA noted remaining language in the RACSR. Karen noted this is why we need to work together on this. EPA noted the obstruction/monolith was a MAJOR design change and the RACSR was not clear on that. Leslie suggested there was text that states the obstruction. She went on to suggest the Navy will be developing a workplan. Karen said that is understood and appreciated. A redesign was probably more appropriate and describing this as an obstruction in the RACSR was not clear. The Navy allowed the contractor to do this design change without data to support this. Brooks suggested the language is changed. Jeff said there is still a lot of objectional language in the RACSR; it was not scrubbed of all the objectional language. Leslie asked for specific areas in the document. Jeff agreed he can put a list together. Karen suggested the Navy review the letter a little more and move the discussion outside the BCT.

6. Miscellaneous Topics/Updates

Rad building RGs: Amy asked about an update on the buildings RGs. At the last Transfers meeting, there was a discussion of two proposals 1) risk assessment calculations and 2) pilot testing of scanning in the fields. Wayne said EPA expected to receive a proposal of scanning buildings in the field. The Navy decided to rerun RESRAD with some changes to the inputs. EPA believes these runs are “a big improvement.” But we do have “a couple of concerns” with the runs, and we are working with our contractors to understand the Navy’s work. We continue to talk with Derek and proposed further discussions with the technical teams. Derek agrees with Wayne’s summary. Prior to doing some other alternative, we wanted to talk to EPA one more time. Derek mentioned EPA’s “Exposure Factors Handbook” was recent news.

Supplemental Environmental Project on Paint Chips – Brooks mentioned the regulatory agencies have some concerns about the lead-based paint chips possibly getting into the bay. This issue got the attention of some other parts of the Navy. The Waterboard had made a suggestion to remediate some buildings onsite. The Navy had a violation on another site, which resulted in a settlement. But no work was needed. The Navy wants to coordinate with the Waterboard to determine

which building could be abated. Karen thought this was great news, and EPA recently submitted a letter on this topic. Derek agreed the Navy would coordinate with the Waterboard and EPA to identify buildings that have potential for paint to sluff off. Karen asked for timing and the Navy mentioned likely next fiscal year. Amy

7. Community Outreach

Notes

EPA Update on Community Meeting - Yesterday, our HQ Office of Land and Emergency Management's newly appointed Assistant Deputy Director Carlton Waterhouse met with a small group of community members, which included Dr. Sumchai, Bradley Angel, and Arianne Harrison. These community members raised many concerns, such as: high concerns about their conclusions on the "radioactive biomarkers" being found in the urine screening; security and access issues for both HPNS and Yosemite Slough; climate change and sea level rise impacted the sustainability of the remedies; dissolution of the RAB;

8. Future Meetings/Action Items

Residents group meeting next week is confirmed for May 13.

The HPS CAC requested an update, which may happen this month or next month. She asked about an update on Parcel G; however, the Navy doesn't have much of an update because of field/contractual delays.

Derek discussed how the Navy is working with EPA on reviews. Kim's email is going forward, not bringing up things in the past is not how we are going to work. "Generally, we will continue to send EPA products where we are interpreting data." The Navy will remove the EPA logo from future products. The Navy's believes it has been appropriate in its decisions to provide materials for review.

Yolanda – EPA has a different perspective on the Navy's decisions to provide EPA the opportunity to review public-facing materials. With all the mistrust, misinformation, concerns at this site, EPA feels we can be a very useful partner in working with the Navy to make critical information accessible to the public and meeting their needs. We don't share the Navy's perspective it is appropriate sharing the right public material with appropriate timing.

D-2: Amy reminded that D-2 is really important and the City would be really upset if the schedule is pushed out further.

9. Adjourn Meeting